

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN, an individual

*Plaintiff,*

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, an individual, EMILY SYLVAN KIM, an individual, PROSPECT AGENCY, LLC, a New Jersey limited liability company, ENTANGLED PUBLISHING, LLC, a Delaware limited liability company, MACMILLAN PUBLISHERS, LLC, a New York limited liability company, UNIVERSAL CITY STUDIOS, LLC, a Delaware limited liability company

*Defendants.*

Case No. 1:22-cv-02435-AT

**Joint Stipulation Extending  
Time To Answer**

WHEREAS, Defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Universal City Studios, LLC, Holtzbrinck Publishers, LLC, d/b/a Macmillan (sued erroneously as Macmillan Publishers, LLC), Entangled Publishing, LLC, Emily Sylvan Kim, and Prospect Agency, LLC (collectively “Defendants”) have each accepted service of the Complaint by signing a Waiver of Service of Summons (“Waiver”);

WHEREAS, pursuant to the Waiver, Defendants have to and including, May 27, 2022, to respond to the Complaint;

WHEREAS, Plaintiff Lynne Freeman (“Plaintiff”) and Defendants agree to further extend Defendants’ time to respond to the Complaint to and including June 27, 2022;

WHEREAS, the Complaint relates to the alleged copyright infringement of four (4) books and consists of 94 paragraphs; and

WHEREAS, Defendants require additional time to respond to the Complaint in order to efficiently review the numerous manuscripts at issue and evaluate Plaintiff’s claims.

NOW, THEREFORE, it is hereby stipulated, by the parties hereto through their respective counsel, as follows:

That Defendants’ time to respond to the Complaint is extended to and including June 27, 2022.

Dated: May 10, 2022

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& SHEPPARD LLP**

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Studios, LLC, Entangled Publishing, LLC and  
Holtzbrinck Publishers, LLC, d/b/a  
Macmillan sued erroneously as Macmillan  
Publishers, LLC

Dated: 5/10/2022

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Dated: May 11, 2022

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